



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601*

August 30, 2021

**BY ECF**

The Honorable Philip M. Halpern  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re:        *United States v. Isaiah Santos*, S3 20 Cr. 626 (PMH)**

Dear Judge Halpern:

The Government respectfully writes in response to the Court's Order regarding defendant Isaiah Santos's request for a new lawyer. The Government takes no position regarding Mr. Santos's request for a new lawyer, but sets out relevant background for the Court's consideration.

The defendant initially had Jesse M. Siegel, Esq. appointed from the Criminal Justice Act ("CJA") panel on the day of his arrest (December 1, 2020). Mr. Siegel was relieved shortly afterwards when the defendant decided to retain Mehdi Essmidi, Esq. On March 1, 2021, Mr. Essmidi was relieved as counsel after Mr. Essmidi filed a motion to be relieved despite several attempts, on his part, to "reform the relationship." (ECF. No. 130). John Burke, Esq., the defendant's current counsel, was appointed that same day.

Since Mr. Burke's appointment, the Government has had several conversations with Mr. Burke regarding (1) the discovery, and (2) a potential disposition. From conversations with Mr. Burke, it appears that he had a number of substantive conversations with the defendant regarding both topics. On or about August 10, 2021—after protracted negotiation—the Government sent Mr. Burke a formal written plea offer.

The Government is available at the Court's convenience should the Court wish to hold a hearing on this matter.

Respectfully submitted,

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Southern District of New York

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cc: All Counsel (via ECF)